

## **ELDORADO-LUGO-MOHAVE (ELM) SERIES CAPACITATOR PROJECT**

**Date:** August 19, 2021  
**To:** Eric Chiang, Project Manager, CPUC  
**From:** Vida Strong, Aspen Project Manager  
**Subject:** Monitoring Report #6: July 1 to July 31, 2021

### **Introduction**

This report provides a summary of the construction and compliance activities associated with Southern California Edison's (SCE) El Dorado-Lugo-Mohave (ELM) Series Capacitor Project (Project). Although the following list includes Project-wide components, this report is limited to construction and compliance activities under the jurisdiction of the California Public Utilities Commission (CPUC), which includes non-federal California lands. Overall project components include:

#### ■ **Series Capacitors:**

- Construction of two new 500 kV mid-line series capacitors (i.e., the proposed Newberry Springs Series and Ludlow Series Capacitors) and associated equipment.
- Installation of two communication paths between the series capacitor sites, which includes approximately two miles of overhead and two miles of underground alignments.
- Providing station light and power to the proposed series capacitors by extending and/or rerouting existing lines to create approximately two miles of overhead and 700 feet of underground 12 kV distribution circuits.

#### ■ **Repeater Facilities:**

- Construction of three new fiberoptic repeater facilities (Barstow, Kelbaker, and Lanfair) within the Lugo-Mohave right-of-way (ROW).
- Installation of distribution lines for light and power at the three proposed fiberoptic repeater sites.

#### ■ **Overhead Clearance Discrepancies:**

- Relocation, replacement, or modification of existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV transmission lines to address 14 of the overhead clearance discrepancies.
- Tower modifications would include raising nine towers up to approximately 18.5-feet by inserting new lattice steel sections in tower bodies.
- Performing minor grading at two locations along the Lugo-Mohave 500 kV transmission line to address two of the overhead discrepancies.

#### ■ **Optical Ground Wire (OPGW):**

- Installation of approximately 232 miles of OPGW which include approximately 59 miles on the Eldorado-Mohave transmission line, approximately 173 miles on the Lugo-Mohave transmission

line, and approximately three miles of underground telecommunications facilities in the vicinity of the Mohave Substation.

- Modifications and strengthening of the ground wire peak of existing suspension towers where OPGW splices would occur (some of these towers would also require minor modifications to the steel in the tower body).

■ **Substation Upgrades:**

- Lugo Substation: Modifications to the existing series capacitors, installation of new terminating equipment, removal of two existing tubular steel poles (TSPs), and installation of two new TSPs on the Eldorado-Lugo and Lugo-Mohave 500 kV transmission lines.
- Eldorado Substation: Modifications on the existing series capacitors and upgrades to the terminal equipment on the Eldorado-Lugo 500 kV transmission line.
- Mohave Substation: Replacement of existing series capacitors on the Lugo-Mohave 500 kV transmission line and installation of new terminal equipment on the Eldorado-Mohave and Lugo-Mohave 500 kV transmission lines.
- Telecommunications Facilities: Installation of approximately 2,000 feet of underground telecommunications facilities within the existing Lugo, Eldorado, and Mohave Substations.

■ **Cathodic Protection (if necessary)**

- Installation of approximately 60 miles of Southern California Gas Company’s (SoCalGas) natural gas pipelines parallel to SCE’s Lugo-Mohave 500 kV transmission line and on other pipelines as needed.

**CPUC Environmental Monitors (EMs)**

CPUC LEM, Jamie Miner, was onsite on July 1, 2021. CPUC EM, Nikolai Starzak was onsite on July 1, 22, and 26.

**CPUC Notices to Proceed (NTPs)**

Table 1 summarizes the NTPs issued for the Project by the CPUC, to date. No additional NTPs are required.

<b>Table 1 - CPUC Notices to Proceed</b>			
<b>NTP</b>	<b>Date Requested</b>	<b>Date Issued</b>	<b>Description</b>
NTP #1	09-22-2020	12-14-2020	<ul style="list-style-type: none"> <li>▪ Modifications at the Lugo Substation</li> <li>Mid-Line Series Capacitor Construction at Ludlow Series Capacitor 5</li> <li>Distribution and Telecommunications Construction for Mid-Line series Capacitors and the Barstow Repeater</li> <li>Staging Yard construction at the Ludlow Series Capacitor Yard</li> </ul>
NTP #2	03-23-2021	04-01-2021	<ul style="list-style-type: none"> <li>▪ Tower raise modifications on the Lugo-Mohave and Eldorado-Lugo transmission lines (two locations)</li> <li>Establishment of Helicopter Landing Zone 184</li> <li>Development of the Coolwater Staging Yard</li> </ul>

<b>Table 1 - CPUC Notices to Proceed</b>			
<b>NTP</b>	<b>Date Requested</b>	<b>Date Issued</b>	<b>Description</b>
NTP #3	04-29-2021	05-13-2021	<ul style="list-style-type: none"> <li>▪ Installation of OPGW fiber optic line along the Lugo-Mojave transmission line from Structure M165-T4 (near California/Nevada border) to Structure M68-T2 (near Ludlow Series Capacitor)</li> <li>Modifications to strengthen overhead structures with new OPGW splice structures</li> <li>Development of the Fenner Staging Yard and Ludlow Alternative Staging Yard</li> </ul>
NTP #4	05-28-2021	06-08-2021	<ul style="list-style-type: none"> <li>▪ Installation of OPGW fiber optic line along the Lugo-Mohave transmission line from Structure M66-T3 (west end) to Lugo Substation (east end)</li> <li>Modifications to strengthen overhead structures with new OPGW splice structures</li> <li>Development of the Arrow Lake Road Staging Yard and Bear Valley Staging Yard</li> </ul>

## Construction & Compliance

A summary of construction and compliance activities is provided below by NTP. Allowed construction activities under each NTP is summarized in Table 1 above.

- **NTP #1.** To date, all pre-compliance materials associated with NTP #1 have been approved by CPUC. Construction activities associated with NTP #1 began on January 4, 2021 and continued throughout the reporting period.
- **NTP #2.** To date, all pre-compliance materials associated with NTP #2 have been approved by CPUC. Construction activities associated with NTP #2 began on June 7, 2021 and continued throughout the reporting period.
- **NTP #3.** To date, all pre-compliance materials associated with NTP #3 have been approved by CPUC. Construction activities associated with NTP #3 began on May 19, 2021 and continued throughout the reporting period.
- **NTP #4.** To date, all pre-compliance materials associated with NTP #4 have been approved by CPUC; however, construction activities associated with NTP #4 have yet to commence.

### Summary of All Construction Activity

Construction activities associated with NTP #1 that were conducted during the reporting period include:

1. For the currently approved Lugo Substation, distribution, and telecommunications components, construction activities are being performed by SCE crews. Currently approved components associated with construction of the Ludlow Series Capacitor and adjacent materials yard are being performed by Beta-Siemens.
2. Construction activities that occurred at the Lugo Substation during the reporting period included installing conduit, ground and conductor wire, bus supports, and circuit breakers, and testing circuit breakers (see Photo 1).
3. Construction activities that occurred at the Ludlow Series Capacitor during the reporting period included material deliveries, maintaining BMPs and desert tortoise fencing, grading, riprap instal-

lation, constructing and removing concrete forms, pouring concrete, and installing conduit (see Photo 2).

4. Construction activities that occurred along the Mid-Line Series Capacitor distribution alignment included drilling and installing poles and anchors, and installing wire from Structure 4793960E to 4793987E (see Photos 3 and 4).
5. To date, activities associated with the Lugo Substation and Ludlow Series Capacitor and Mid-Line are approximately 46 percent and 25 percent complete, respectively.

Construction activities associated with NTP #2 that were conducted during the reporting period include:

1. The currently approved tower modifications are being performed by AMPJACK crews.
2. Construction activities that occurred along the Lugo-Mohave transmission line included material and equipment deliveries, tower assembly, and tower raising at Structure M14-T4 (see Photo 5).

Construction activities associated with NTP #3 that were conducted during the reporting period include:

1. For the currently approved structure modifications and OPGW installation, construction activities are being performed by American Power crews.
2. There were no construction activities associate with NTP #3 conducted during the reporting period.

### **Environmental Compliance**

1. There were no Incident Reports, Project Memoranda, or Non-Compliance Reports issued by the CPUC during the reporting period.
  - On July 6, 2021, SCE submitted a Response Letter for the Non-Compliance Report (NCR) issued by the CPUC on June 16, 2021 (see Table 3). On July 12, 2021, the CDFW provided a list of questions and concerns associated with SCE's Response Letter. A subsequent meeting between the CPUC, CDFW, and SCE was held on July 19, 2021, to resolve outstanding questions and issues from the NCR. SCE transmitted additional responses to CDFW's questions/concerns on July 29, 2021. The CPUC provided additional comments related to SCE's responses on August 18, 2021. To date, SCE is continuing to implement a limited Project stand down (helicopter activities) until final resolution is confirmed by all participating agencies.
2. There were two Level 1 SCE self-reported incidents documented during the reporting period.
  - On July 15, 2021, a Level 1 Incident was documented for conducting biological sweeps at the Ludlow Series Capacitor prior to approved hours.
  - On July 26, 2021, a Level 1 Incident was documented for using an unapproved access road near the Ludlow Series Capacitor due to flooding along the approved route (see Photo 6). The biological monitor swept the approximately 0.40-mile section of unapproved road prior to and after it was used. According to SCE, no impacts to sensitive resources were identified.
3. On June 28, while confirming biologists' approvals specific to the ELM Project, the CPUC LEM discovered that recommendations for nest buffer reductions were being completed by biologists who were not approved as Avian Biologists or Lead Avian Biologists; therefore, the process outlined by the Nesting Bird Management Plan (NBMP) was not being followed. Notification was sent to SCE regarding that Avian Monitors are not considered approved to make these determinations, and that if there were

any current reduced buffers recommended by persons not qualified and approved as Avian Biologists, those would be immediately considered null and void. The LEM also requested that SCE identify the Lead Avian Biologist (as described in the NBMP) for the Project. SCE is currently submitting resumes to the resource agencies for approval of a Lead Avian Biologist and Avian Biologists.

4. There were no SWPPP maintenance items or corrective actions recorded during the reporting period. To date, there are no open SWPPP maintenance items or corrective actions.
5. There were no reportable (>1 gallon) and two non-reportable (<1 gallon) spills identified during the reporting period. The non-reportable spills occurred along the Mid-Line Series Capacitor distribution alignment on July 21 and 23, 2021 and each consisted of a small amount of hydraulic fluid. According to SCE, the contaminated material was properly removed from the site.
6. To date, there are 16 active buffers on unconfirmed golden eagle nests (nest status needs to be verified) either located within or with buffers that overlap work areas under CPUC oversight. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the project Nesting Bird Management Plan (NBMP). There were no nest removals reported within work areas under CPUC oversight during the reporting period.
7. Special-status species observed or detected during the reporting period included loggerhead shrike, burrowing owl, prairie falcon, Mojave fringe-toed lizard, desert tortoise, desert kit fox.
8. On June 16, 2021, SCE submitted copies of email messages identifying approvals from the County of San Bernardino for work extended hours.

### Minor Project Refinements (MPRs) and Temporary Extra Workspaces (TEWS)

Table 2 summarizes the CPUC MPRs and TEWS issued since the start of construction.

<b>Table 2 – Minor Project Refinements (MPRs) and Temporary Extra Workspaces (TEWS)</b>				
<b>MPR/ TEWS</b>	<b>Date Requested</b>	<b>Date Issued</b>	<b>Location</b>	<b>Description</b>
TEMPORARY EXTRA WORKSPACE (TEWS)				
TEWS #001	05-10-2021	05-10-2021	Lugo-Mohave	▪ Use of existing access road between Structures M162-T1 and M163-T1 and M164-T1 and M164-T2

## CPUC Incident Reports, Project Memoranda (PMs) and Non-Compliance Reports (NCRs)

Table 3 summarizes the CPUC Project Memorandum and Incident Reports issued since the start of construction.

<b>Table 3 – CPUC Incidents, Project Memoranda (PM), and Non-Compliance Reports</b>				
<b>Incident/PM/NCR</b>	<b>Regulatory Requirement</b>	<b>Date Issued</b>	<b>Location</b>	<b>Description</b>
<b>INCIDENT REPORTS</b>				
Level 1 Incident	MM CR-5	02-04-21	Ludlow Series Capacitor	<ul style="list-style-type: none"> <li>▪ On February 3, 2021, the CPUC EM documented no monitors present in an area where monitoring is required.</li> </ul>
Level 1 Incident	APM AIR-02	04-07-21	Ludlow Series Capacitor	<ul style="list-style-type: none"> <li>▪ Between March 30 and April 6, 2021, a non-compliant piece of heavy equipment was utilized.</li> </ul>
Level 1 Incident	MM BR-10	04-08-21	Project-wide	<ul style="list-style-type: none"> <li>▪ Data associated with golden eagle surveys and potential nesting sites was not provided to the CPUC within the required timeframe.</li> </ul>
Level 1 Incident	MM T-3 Helicopter Use Plan MMCRP	06-14-21	Project-wide	<ul style="list-style-type: none"> <li>▪ Providing insufficient data for helicopter flight tracks review</li> </ul>
<b>PROJECT MEMORANDUMS</b>				
PM 001	ITP 8.8 MM BR-1	03-08-21	Ludlow Series Capacitor Lugo Substation	<ul style="list-style-type: none"> <li>▪ On March 5, 2021, the CPUC EM observed project activities that had occurred prior to the installation of required desert tortoise exclusionary fencing. Several records identified of monitors commencing activities onsite prior to CPUC concurring with agency approvals.</li> </ul>
<b>NON-COMPLIANCE REPORTS</b>				
NCR 001	MM T-3 MM BR-10 NBMP MMCRP Helicopter Use Plan	06-16-21	Various	<ul style="list-style-type: none"> <li>▪ Operating a helicopter without the required GPS tracking device</li> <li>Removing buffers for golden eagle nests without notification or documentation</li> <li>Unreported mortality event of red-tailed hawk</li> <li>Non-notification of nest buffer reduction at red-tailed hawk nest</li> <li>Late reporting of Level 1 incident of helicopter nest buffer incursion</li> <li>Multiple nest buffer incursions over the period of 5/17/21 to 6/6/21</li> <li>Inadequate daily flight track review by contractor</li> <li>Inappropriate inactive nest determination based on 15-minute observation of nest</li> <li>Lack of self-reporting by contractor when compliance items are identified</li> </ul>

## PROJECT PHOTOGRAPHS



**Photo 1:** Installing bus supports at Lugo Substation (July 1, 2021).



**Photo 2:** Grading activities at Ludlow Series Capacitor (July 1, 2021).



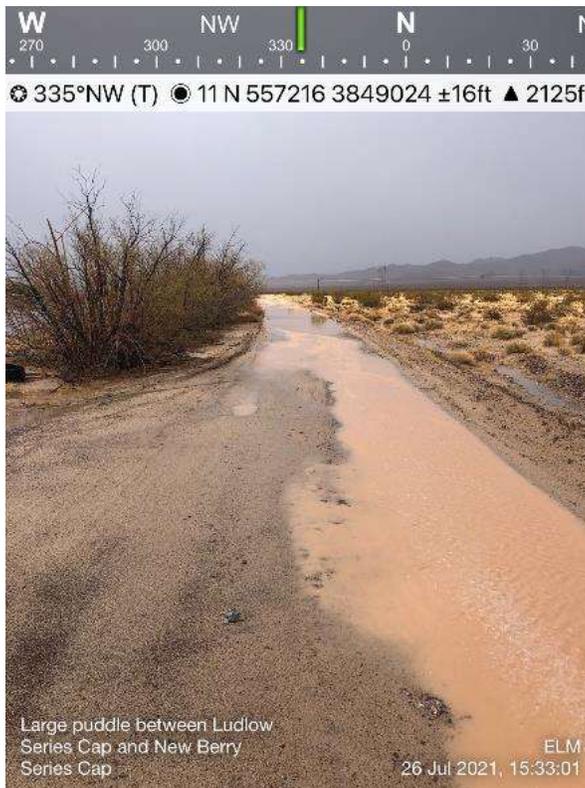
**Photo 3:** Pole installation along Mid-Line Series Capacitor distribution alignment (July 22, 2021).



**Photo 4:** Wire installation along Mid-Line Series Capacitor distribution alignment (July 26, 2021).



**Photo 5:** Raising Structure M14-T4 (July 19, 2021). Photo courtesy of SCE.



**Photo 6:** Approved road flooded. July 26, 2021. Photo courtesy of SCE.